

ORIGINAL

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

No. 4:15-CR-151-O

RACHEL ADAMS (01)

FACTUAL RESUME

INDICTMENT: Count One: Conspiracy to Possess with Intent to Distribute a Controlled Substance (methamphetamine) (in violation of 21 U.S.C. § 846, and 21 U.S.C. §§ 841(a)(1) and (b)(1)(B))

PENALTY: \$5,000,000 fine - not less than 5 years imprisonment and not more than 40 years imprisonment, or both such fine and imprisonment, plus a term of supervised release of not less than 4 years.

MAXIMUM PENALTY:

\$5,000,000 fine and not less than five (5) years nor more than forty (40) years imprisonment, plus a term of supervised release of not less than 4 years. If the defendant violates any condition of supervised release, the Court may revoke such term of supervised release and require the defendant to serve an additional period of confinement. Further the Court must impose a Mandatory Special Assessment of \$100.00.

ELEMENTS OF THE OFFENSE:

The essential elements which must be proved beyond a reasonable doubt in order to establish the offenses charged in Count One of the Indictment are as follows:

First: That two or more persons, directly or indirectly, reached an agreement to distribute or possess with intent to distribute a controlled substance, as charged in the indictment;

Second: That the defendant knew of the unlawful purpose of the agreement;

Third: That the defendant joined in the agreement willfully, that is, with the intent to further its unlawful purpose; and

Fourth: That the overall scope of the conspiracy involved at least 50 grams of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

STIPULATED FACTS:

Since approximately 2014, Rachel Adams has received multi-ounce and pound quantities of methamphetamine from Michael Colby. Since approximately 2014, Gavin Seguin, Shanda Hawkins, ~~Chance Brooks~~, ~~Alisha Feeney~~, and Jerry Curry received multi-ounce and pound quantities of methamphetamine on consignment from Rachel Adams. In turn, Rachel Adams, Gavin Seguin, Shanda Hawkins, ~~Matthew Rutledge~~, ~~Chance Brooks~~, and Jerry Curry distributed methamphetamine to various customers in the Benbrook, Fort Worth, Arlington, and Wichita Falls, Texas areas, returning to Rachel Adams for additional methamphetamine. In this manner, Gavin Seguin, Shanda Hawkins, ~~Matthew Rutledge~~, ~~Chance Brooks~~, Jerry Curry, Michael Colby, and Rachel Adams conspired with each other and others to possess with intent to distribute more than 50 grams of methamphetamine.

SIGNED this 17th day of July, 2015.

  
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RACHEL ADAMS  
Defendant

  
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J. WARREN ST. JOHN  
Counsel for Defendant